

June 2, 2018

Grand Mesa, Uncompahgre and Gunnison National Forests
Attn: Plan Revision Team
2250 South Main Street
Delta, CO 81416

Re: GMUG Forest Plan Revision Scoping Comments

Dear Plan Revision Team,

Thank you for taking the time to consider these scoping comments submitted jointly by Outdoor Alliance and Outdoor Alliance Colorado regarding the Grand Mesa, Uncompahgre, and Gunnison Forest Plan Revision #51806. Outdoor Alliance is a coalition of nine member-based outdoor recreation organizations: American Whitewater, American Canoe Association, Access Fund, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, and the Colorado Mountain Club. With a presence in all 50 states, Outdoor Alliance has a collective membership of nearly 200,000 individuals and a national network of more than 1,000 local clubs.

Together, our network reaches nearly 400,000 passionate outdoor enthusiasts. For the past ten years, Outdoor Alliance has been bringing together the voices of paddlers, mountain bikers, hikers, climbers, and backcountry skiers to conserve America's public lands and protect the human-powered outdoor experience. Our work is unique because it seeks to balance both conservation and sustainable recreational access. In Colorado, this work is achieved in part through our regional partnership Outdoor Alliance Colorado – a coalition of five member-based organizations representing the state's human-powered outdoor recreation community.

The *Grand Mesa, Uncompahgre, and Gunnison National Forests Forest Plan Revision: Scoping* document includes many commendable elements. In our comments Outdoor Alliance highlights additional elements which directly affect human-powered recreationists and the lands and waters in the GMUG. In addition to the specific points which follow, Outdoor Alliance would like to emphasize:

- Outdoor recreation is essential to communities adjacent to the GMUG National Forests. It fuels economies through direct consumer spending, provides jobs in outdoor recreation businesses, and attracts high-skilled workers and businesses drawn by the GMUG's natural beauty and recreational opportunities.

- The human-powered outdoor recreation opportunities in the GMUG include climbing, mountain biking, skiing, hiking, paddling and other sites, many of which are world-renowned and invaluable for both local residents and visitors.
- While outdoor recreation is often “dispersed”, the outdoor recreation community seeks out highly specific opportunities based on qualitative factors unique to the activity and a given site. Understanding these unique qualitative aspects of outdoor recreation is essential for planning.
- We encourage the planning team to start with a robust, geospatial inventory of activities occurring on the Forests. Only through spatial data can the qualitative character of a site, and other important attributes such as scenic setting, access, and usage patterns, be assessed.

Part I: Forest Plan Vision, Roles and Contributions

Our community appreciates the planning team’s specific articulation of the question of why the GMUG matters and the recognition that the forests have both important intrinsic and use values. Under this heading in the scoping document, a few points bear emphasis:

Why the GMUG matters: Public Enjoyment

First, we appreciate that the planning team leads this section with “public enjoyment.” The GMUG is a unique in that contains world-class recreation opportunities which draws local residents, and visitors from Colorado and around the world to the GMUG to recreate on the world class Continental Divide, 401 and Teocalli Ridge trails, enjoy the potential and Eligible Wild and Scenic Rivers such as Oh-be-joyful, Lower Taylor and Upper Uncompahgre, and find solitude in Collegiate Peaks Maroon Bells-Snowmass and the Forests’ eight other Wilderness areas. In addition to the human-powered activities listed in the scoping document (Hiking; trail running; mountain biking; rafting and kayaking; cross-country, back-country, and downhill skiing; and snowboarding), OA requests that the planning team add the variations of climbing that take place in the GMUG, including: rock climbing, ice climbing, and bouldering.

To help the Forest Service better understand recreation resources on the forest, we previously provided a geodatabase containing data for climbing locations, mountain bike trails, popular backcountry ski zones, and whitewater runs on the GMUG. We hope that if the Forest Service understands how the public currently recreates on the GMUG, it will be better equipped to manage these uses and alleviate conflicts with other resource values and uses.

While the planning team is correct in identifying the importance of dispersed recreation opportunities on the Forests, it is also essential to recognize that “dispersed” does not mean that recreationists visit particular locations at random. Rather, the outdoor recreation community seeks out highly specific opportunities based on factors like rock

quality and difficulty for climbers; water levels, difficulty, and quality for paddlers; snow conditions and topography for skiers; and the unique confluence of setting and trail attributes for mountain bikers. Understanding these essential qualitative aspects of outdoor recreation—as well as the importance of other attributes like scenic setting, access, and potential user conflict—are essential, and can only be achieved by beginning with a robust, geospatial inventory of activities occurring on the Forests. This information is also essential for developing Recreation Opportunity Spectrum settings and required plan components like management and geographic areas.

Why the GMUG matters: Commodity Use and Community Connections

Second, under “Commodity Use and Community Connections,” it is essential that planners recognize more thoroughly the economic and community importance of recreation on the GMUG forests in ways that go far beyond the tourism industry. Colorado College’s *Conservation in the West Poll* found that the top reasons Coloradans choose to live here are the state’s clean environment, access to public lands and outdoor recreation opportunities, and residents’ ability to maintain a healthy outdoor lifestyle.¹ Put another way, access to superlative outdoor settings is Colorado’s competitive advantage when competing for skilled employees and new businesses.

Combined with the \$28 billion dollars in direct spending, 229,000 jobs and \$9.7 billion dollars to of wages and salaries outdoor recreation contributes to the Colorado economy, Colorado’s outdoor recreation opportunities are an economic powerhouse that makes the state a prime tourism destination and an amazing place to live, work and to raise our families.

Coloradoans’ appetite for outdoor opportunities is not waning. Colorado’s *State Comprehensive Outdoor Recreation Plan* found that not only did 90 percent of Coloradans participated in some form of outdoor recreation in Colorado over the survey year, their survey also revealed that, “60 percent of Coloradans will either greatly increase or somewhat increase their participation in outdoor recreation over the next five years.”²

Outdoor recreation in the GMUG is a powerful economic engine. Residents of Colorado’s 3rd Congressional District—which encompasses the main population centers of the GMUG—spend \$2.19 billion on outdoor recreation each year, and the area is home to at least 241 outdoor companies.³ This spending feeds the nation’s outdoor recreation economy which accounts for 2% (\$373.7 billion) of the nation’s GDP in 2016, according to a recently released Bureau of Economic Analysis report, and this sector of the economy

¹ Colorado College, *Conservation in the West Poll*, 2015.

² “Strategies for Sustaining Colorado’s Outdoor Heritage, 2014 Colorado Statewide Comprehensive Outdoor Recreation Plan, 2014, 35.

³ “Colorado 3rd Congressional District.” Outdoor Industry Association, 2018., https://outdoorindustry.org/wp-content/uploads/congressionaldata/COLORADO/OIA-ConDist-Colorado_3.pdf.

is growing a full percentage point faster than the U.S. economy overall.⁴ In Colorado, outdoor recreation creates nearly four times as many direct jobs as the oil and gas industry and the mining industry combined.⁵

The GMUG supports this robust outdoor recreation economy for many of the gateway communities bordering the forest. Recreation is the path through which most people experience national forests, and it is essential that management for, and impacts to, recreation be at the forefront of forest planning. Historically, with the exception of a few focused areas, recreation has been treated as an after thought—a side benefit of national forest lands after timber, grazing, mineral development, and fire management. However, recreation on our national forests doesn't occur in just a few focused areas. The growth in recreation, particularly dispersed recreation, means that the Forest Service must consider how recreation management is integrated into other management activities across the full extent of the national forest.

Part II: Key Needs for Change

OA applauds the scoping document's recognition of the importance of recreation as a key need for change. Recreation is both an economic driver and a way of life for the communities throughout Colorado, including those in proximity to the GUMG National Forests. We ask the planning team to be precise in crafting the Forest Plan's direction around recreation and recognize the many types of outdoor recreation in the Forests.

The human-powered recreation opportunities in the GMUG are unparalleled, and the GMUG forests count among their neighbors some of Colorado's, and America's, most iconic outdoor recreation communities. The trails of Crested Butte, including 401 and Teocalli Ridge, lay claim to being one of the birthplaces of mountain biking. Likewise, Ouray is considered by many to be "America's Ice Capital" because of its world-class ice climbing routes, including the Ames area. Hikers and horseback riders can find solitude in ten Wilderness areas encompassed by the Forests. The Washington Gulch and Slate River drainages near Crested Butte offer easily-accessible Nordic and backcountry skiing opportunities, while the San Juan Huts on the Ouray Ranger District provide multi-day backcountry experiences for skiers and snowshoers, as well as summer users. These recreation sites and others should be prioritized in the Forest Plan, not only for their economic value to the communities, but also for the inherent value of the unique opportunities that do not exist elsewhere in our state.

Contribute to Social and Economic Sustainability

Given the aforementioned importance of outdoor recreation to the GMUG and surrounding communities, we are pleased to see the recognition that, "In many areas, recreation is a driver and should be a major consideration when Forest Plan desired

⁴ Bureau of Economic Analysis, Outdoor Recreation Satellite Account, 2018, <https://www.bea.gov/outdoor-recreation/>.

⁵ "Colorado." Outdoor Industry Association, 2018, <http://outdoorindustry.org/state/colorado/>.

conditions are developed.” To act most effectively on this consideration, we believe it essential that the planning team carefully consider the varied ways that people enjoy the GMUG forests and employ geospatial data and local knowledge thoroughly when developing plan components.

OA echoes the need to plan for increased trail development in sustainable settings in the GMUG. As the state’s *Comprehensive Outdoor Recreation Plan* and the Outdoor Foundation’s *Outdoor Recreation Participation Topline Report* demonstrate, the demand for recreation amenities will grow significantly in the future with trail-based recreation leading these trends. But trail development must not be measured in miles alone. A diversity of trail types should be prioritized for the GMUG including opportunities for motorized and non-motorized settings. Trails should be comprised of stacked-loop systems concentrating use in specific areas, often offering close access to local communities, but also longer point-to-point trails in backcountry settings offering remoteness and solitude to travelers regardless of their mode of travel. Trail systems in the GMUG should offer a continuum of difficulty of travel (easy to advanced) and incorporate non-trail access points, such as access to river put-ins, climbing crags, and other non-trail based activities.

The revised forest plans should define ‘sustainable settings’ for concentrated trail development that establish criteria such as trail density, level of soil disturbance, social carrying capacity, etc. within a larger sustainable recreation framework. As part of this framework, the GMUG should develop a landscape-scale strategy to assess suitability for motorized recreation activities while considering user conflict issues including: acceptable levels of noise heard within non-motorized areas, access to parking and trailheads, speed and safety on shared routes.

With regard to noise, noise is one of the major causes of conflict between motorized and non-motorized uses. To minimize this conflict, the GMUG should undertake a noise impact modeling study to help determine acceptable levels of noise within non-motorized areas and inform ROS zoning. By undergoing comprehensive programmatic planning at the forest plan level, the GMUG can ensure that future site-specific planning, especially travel management planning, is a smoother and less time-intensive process.

In systematically managing scenery in the GMUG it is important to account for the viewshed of important recreational resources—not only of scenic byways. Recreation is location specific, and the diversity mentioned above for trails is true for all outdoor recreation settings. The setting and viewshed are a supremely important aspect of the quality of the recreation site.

Provide for Ecological Sustainability

The plan must go beyond “considering” planning for climate change and desired plant composition and should instead provide affirmative and firm direction for the GMUG’s desired plant community composition for dominant ecosystems and adaptive responses

to impacts of climate change and ensure that forest air quality resources are not degraded as a result of future air pollution.

Climate change particularly affects recreation in the winter context and is an important reason to for the GMUG to perform winter travel management. The Forests should consider how climate change will impact winter use of the forests and whether shoulder season use will, in the future, include areas that are currently snow-covered. The changing snowpack may open new opportunities for or create challenges from motorized and non-motorized recreational use. We encourage the planning team to follow the guidance on winter travel management provided by our partners Backcountry Snowsports Initiative (BSI) and Winter Wildlands Alliance (WWA) in their June 1st, 2018 *Grand Mesa, Uncompahgre, Gunnison Forest Plan Revision Scoping Comments* letter.

Integrate Resource Management for Multiple Uses and Ecosystem Services

We are extremely pleased to see the planning team's intent to use ROS as a means of better integrating resource management across planning areas. To ensure that this is accomplished effectively, it is essential that the planning team begin with a spatial depiction of the recreation resources on the forests. ROS settings should reflect existing and, to the extent possible, prospective uses, and settings must reflect the desired conditions for the forests rather than merely reflecting ROS settings under previous plans or existing conditions on the ground.

Incorporate Best Available Science, Update to Existing Law and Policy

We appreciate the scoping document's emphasis on updates to reflect best available science. We wish to emphasize that this need for change item should include incorporating the best available social science—recognizing the increasing importance of outdoor recreation as an economic driver, both as an industry in its own right, and in its capacity as a draw for high-skill workers and employers beyond the outdoor industry sector drawn by the outdoor recreation opportunities on Colorado's public lands.

Best available science must also include information provided by the user community related to recreational resources on the forest, whether in the form of geospatial data submitted by organizations like ours, analog sources like guidebooks, or crowd-sourced information sources like the American Whitewater National Whitewater Inventory⁶, Mountain Project⁷, MTB Project⁸, TrailForks⁹, and others.

⁶ "National Whitewater Inventory." American White Water, 2018, <http://www.americanwhitewater.org/content/River/view/>.

⁷ "Rock Climbing Guides: Routes, Photos & Forum." Mountain Project, 2018, <http://www.mountainproject.com/>.

⁸ "Mountain Bike Trail Maps." MTB Project, 2018, <https://www.mtbproject.com/>.

⁹ "Mountain Biking Trail Database." Trailforks, 2018, <https://www.trailforks.com/>.

Part III: Management Area Framework

We appreciate the continuum of management categories proposed in the scoping document, which is appropriate given the diversity of uses in the GMUG forests. Additionally, we appreciate the incorporation of Roadless Areas into the framework and the distinction between dispersed and developed recreation opportunities.

Within the “natural processes dominate” heading, we believe it essential to note that these areas are suitable for recreational use. Upper Tier Colorado Roadless Areas, in particular, include a number of superlative recreational resources, and many of these areas were designated in the upper tier at the inception of the Colorado Roadless Rule precisely because of their recreational significance.

We believe the “backcountry” designation for some areas reflects a sound approach. With regard to recreation focus areas and high-use recreation emphasis areas, we believe that planners should adopt a conservative approach to considering the suitability of these areas for timber harvest recognizing, in particular, that close-to-town or more accessible areas may nevertheless deserve a high degree of protection from uses that have the potential to degrade the recreational experience.

Finally, we believe it essential that the planning team consider the effects of seasonality on management settings and develop winter-specific ROS settings to ensure that management is responsive to the differing patterns of use in winter. For winter-specific ROS settings guidance we again encourage the planning team to follow the recommendations provided by our partners Backcountry Snowsports Initiative (BSI) and Winter Wildlands Alliance (WWA) in their June 1st, 2018 “Grand Mesa, Uncompahgre, Gunnison Forest Plan Revision Scoping Comments” letter.

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Outdoor Alliance strongly supports the 2012 Planning Rule and, alongside our national partners, we continue to be heavily invested in its success on the ground. We look forward to continuing to work with the GMUG planning team to ensure that the GMUG’s revised forest plan successfully integrates sustainable recreation management, promotes partnership opportunities, and protects and conserves forest resources. The GMUG forests support world-class recreational resources, unique and important natural features, and thriving outdoor recreation community and economy. Much is at stake in this revised plan, and we want to help ensure that it is robust, sustainable, and able to adapt to whatever changes the next 20 years may bring.

We appreciate the opportunity to provide comments and we look forward to continuing to work with you on the GMUG plan revision.

Best Regards,



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Founding Member
Outdoor Alliance Colorado



Louis Geltman
Policy Director
Outdoor Alliance

cc: Nathan Fey, Colorado River Program Director, American Whitewater
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